

From: Matthew Barlow MBarlow@WNLaw.com 
Subject: RE: TMM Data v. Braganza, Case No. 14-729 (EDNC) [IWOV-1.FID1567485]
Date: December 16, 2015 at 6:40 PM
To: Nick Sanservino Jr nsanservino@thenoblelaw.com
Cc: Drew Vanore dvanore@bcvtlaw.com, Cicero Love clove@thenoblelaw.com, The Noble Law Firm Noble In@thenoblelaw.com, estevens@poynerspruill.com, David R. Todd DTodd@WNLaw.com, Tom R. Vuksinick TVuksinick@WNLaw.com

MB

Nick –

TMM Data agrees to rescind the “confidential-attorney’s eyes only” designation for the document bearing the Bates Nos. T000182-84. As such, the document may be included in a filing without being sealed as per the protective order.

Thanks.

MATTHEW A. BARLOW

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From: Nick Sanservino Jr [mailto:nsanservino@thenoblelaw.com]

Sent: Tuesday, December 15, 2015 5:03 PM

To: Matthew Barlow

Cc: Drew Vanore; Cicero Love; The Noble Law Firm Noble; estevens@poynerspruill.com

Subject: TMM Data v. Braganza, Case No. 14-729 (EDNC)

Matt:

On Thursday, we will be filing papers with the Court and want to submit document bates-stamped T000182-84 (Deposition Ex. 7), which is the October 29, 2014 email that Chris Walsh sent to Travis Henderson and Andrew Flanagan at Lenovo (copy to Bob Selfridge). I’ve attached a copy of the document below for your convenience.

TMM Data previously designated T000182-84 as “Confidential-Attorney’s Eyes Only” under the protective order in this case. I believe this designation was in error, as there does not appear to be any basis for labeling the document as “confidential” or “confidential-attorney’s eyes only.”

Please let me know in writing by the close of business tomorrow whether: (i) TMM Data will rescind the “confidential-attorney’s eyes only” designation for this document; and (ii) TMM Data consents to the filing of this document without it being sealed, etc. under the protective order. If TMM Data does not agree to the above, we ultimately will need to file a motion with the Court, causing additional unnecessary expense to Mr. Braganza. Thanks.

Nick

To: SCW 13(jsw13@immdata.com)
From: Chris Walsh
Sent: Tue, Oct 28, 2014 3:33:24 PM
Importance: Low
Subject: Fed: Courtesy Notification Regarding Complaint Filed
Categories: multipart/mixed; boundary="01c11122041-5ba7c010-0e02760"; charset="utf-8"
[F1200001.EK11_Complaint_TWMB04.pdf](#)

----- Forwarded message -----
From: Chris Walsh <chris.walsh@immdata.com>
Date: Wed, Oct 29, 2014 at 3:18 PM
Subject: Courtesy Notification Regarding Complaint Filed
To: Travis Henderson <Travis.Henderson@lenovo.com>; Andrew Flanagan <af@lenovo.com>
Cc: Bob Selfridge <Bob.Selfridge@immdata.com>

Travis and Andrew,

As you may or may not be aware, TheM (aka recently filed a Complaint against Ashish Brugaria. We felt compelled to do this because Mr. Brugaria has been appraising our customers in an effort to disrupt our business. In particular, Ashish has slandered our company by accusing us of illegal behavior and also has slandered us personally, calling us "con men." Most troubling, Ashish is urging our customers to cease doing business with us.

When our business relationship with Lenovo ended, we were assured that both parties would behave professionally and would not disparage each other. As a result of those assurances, we do not believe that Ashish's actions are sanctioned by Lenovo, and are likely unknown to Lenovo. As such, our complaint is directed at Ashish personally, and not at Lenovo.

As you know, this is a small industry, and Ashish is very active in the same circles of companies we work with. It is a regular occurrence to cross paths with mutual business contacts. As you can surely appreciate, we felt the need to take this action to protect our business reputation and good will.

ATTORNEYS' EYES ONLY

TWMB04